

ORIGINAL

DOCKET FILE COPY ORIGINAL

ANN BAVENDER\*  
ANNE GOODWIN CRUMP\*  
VINCENT J. CURTIS, JR.  
PAUL J. FELDMAN\*  
ERIC FISHMAN\*  
RICHARD HILDRETH  
EDWARD W. HUMMERS, JR.  
FRANK R. JAZZO  
CHARLES H. KENNEDY\*  
KATHRYN A. KLEIMAN  
BARRY LAMBERGMAN  
PATRICIA A. MAHONEY  
M. VERONICA PASTOR\*  
GEORGE PETRUTSAS  
LEONARD R. RAISH  
JAMES P. RILEY  
MARVIN ROSENBERG  
KATHLEEN VICTORY\*  
HOWARD M. WEISS  
\*NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ROSSLYN, VIRGINIA 22209

P. O. BOX 33847

WASHINGTON, D.C. 20033-0847

(703) 812-0400

TELECOPIER

(703) 812-0486

ROBERT L. HEALD  
(1966-1983)  
PAUL D.P. SPEARMAN  
(1936-1982)  
FRANK ROBERSON  
(1936-1961)

RETIRED  
RUSSELL ROWELL  
EDWARD F. KENEHAN  
FRANK U. FLETCHER

OF COUNSEL  
EDWARD A. CAINE\*

WRITER'S NUMBER  
(703) 812-

0470

May 5, 1994

RECEIVED

MAY 5 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

RE: CC Docket No. 92-166

Dear Mr. Caton:

Transmitted herewith, on behalf of Conus Communications Company Limited Partnership, are an original and four copies of its Comments in the above-referenced proceeding.

Should any questions arise concerning this matter, please contact this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH

  
Frank R. Jazzo  
Counsel for  
Conus Communications Company  
Limited Partnership

FRJ/rhw  
Enclosure

No. of Copies rec'd  
List ABCDE

244

Conus Communications  
3415 University Avenue  
Minneapolis/St. Paul, MN 55414  
(612) 642-4645 FAX: (612) 642-4680



RECEIVED

MAY - 5 1994

May 4, 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

RE: CC Docket No. 92-166  
*Amendment of the Commission's Rules to  
Establish Rules and Policies Pertaining to a  
Mobile Satellite Service in the  
1610-1626.5/2483.5-2500 MHz  
Frequency Bands*

Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Dear Mr. Secretary,

Conus Communications Co. (Conus) hereby encourages the Federal Communications Commission to adopt rules that will license satellite systems to provide voice and data mobile satellite services (MSS). Conus is not presently in a position to recommend specific spectrum for the MSS, but encourages the Commission to provide allocations in bands that:

1. Provide for good quality service to hand held units in various terrain situations.
2. Would allow for the development of a single terminal that would access the MSS and terrestrial cellular service with equal ease on a cost effective basis.
3. Are capable of being "The" telephone service in remote areas.
4. Are available over as much of the globe as possible.

Conus, based in St. Paul, Minnesota, operates a cooperative satellite news gathering system consisting of over 150 broadcasting operations around the world and is the original creator of satellite systems specifically designed to implement satellite news gathering. Conus has been instrumental in developing and promoting satellite news gathering within North America as well as being involved in the development of the first "fly-away" Earth terminals. These terminals are now common for international news gathering.

When Conus started its satellite news gathering operations in 1984 there were no mobile telecommunication facilities with regional or national coverage that could easily be adapted to satellite news gathering. Conus had to create systems to support the video and audio associated with the news gathering effort. Television origination and television news coverage of breaking news events, in particular, is a communication intensive undertaking.

Today, that job is made easier with the advent and wide spread use of cellular telephony and will become easier still, in the future, with MSS systems capable of operating from vehicles in motion

that do not require highly directive antennas to operate. In order to provide maximum spectral efficiency and the widest range of user features, these contemplated MSS systems are all based on digital transmission which will, ultimately, allow us not only the enhanced telephony features, but non-real time transmission of high quality broadcast video.

The coverage of world news events frequently puts our crews in the position of being in areas that have either never had, or have inoperative conventional communication services. A ubiquitous global communications system would be a dream come true for our industry.

The Inmarsat system, which has revolutionized the way news is covered, has provided the test bed for the broadcast news community to know how important and successful such a MSS system can be. Presently the size, cost, and limited channel availability of the Inmarsat equipment and service restrict its use to a small group of customers with high value traffic.

Access to global communications has been instrumental in encouraging trade and minimizing the differences between nations. This access has been a factor in our ability to establish news relationships with other broadcasters throughout the world. The rapid transition of the Eastern European states from Socialism and Communism to free economies has, in large part, been brought about by increasing access of business and individual citizens to communication and information with and from the West.

Universal satellite delivered portable telephone service will be one of the important building blocks in improving the economic well-being of the under developed parts of the world. Such a universal service will also provide impetus for growth in those parts of the world and provide an expanding market for U.S. goods and services including those of Conus.

New MSS services that the Commission seeks to license are ideally suited to support our business relationships and news operations.

We urge the Commission to favorably consider the beneficial impact of the ubiquitous, on demand communications capability via hand held phones that MSS systems will make possible. It is vitally important to allocate suitable spectrum to the MSS.

Sincerely,

A handwritten signature in cursive script, reading "Ray Conover".

Ray Conover  
Vice President/Director of Engineering

RC:lt